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BY ECF

Hon. Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Maliek Brown v. City of New York, et al., 19 CV 1575 (NG)(RML)

Your Honor:

I represent the plaintiff. I write to request an extension of discovery from September 13, 2021 until December 13, and a corresponding adjournment of the September 13th conference. Defendants consent to this application. This extension is required due to the large number of defendants and an unusually broad scope of issues and alleged damages.

Since the last extension request, plaintiff has filed, and defendants have answered, a third amended complaint, and plaintiff has taken the depositions of three of the twenty-one named defendants. In addition to the activities outlined above, to date, the parties have responded to discovery demands, exchanged paper discovery, procured voluminous medical records, engaged in extensive case discussions and settlement negotiations, and taken plaintiff's deposition. At present, there are no contested discovery issues.

Defense counsel begins a trial on September 14 that is anticipated to take about a week. At the conclusion of this trial, the parties will continue taking defendants' depositions and hope to complete a significant portion of the remaining depositions within the extension period, though the parties do not feel it is likely that they will be able to complete discovery within this period.

I thank the Court for its consideration of this request and apologize for its late hour.

Respectfully submitted,
/s

Robert Marinelli

cc: ACC Joseph Zangrilli